

Coal Lease Review Comments-Kevin Dwyer, 1149 E. Sunnyside, SLC, UT 84102

I've lived in Utah for 26 years.

I am a Salt Lake resident and former resident of Grand and San Jaun countie/s.

The energy market and economics are vastly different than they were in in the 1980s, the last time the coal lease process was reviewed.

Global use of coal fell by about 180 million tons, or about five per cent, in the first three-quarters of 2015 versus the same period in 2014 – the largest decline in history.

In December 2015, the Paris climate agreement became the first-ever legally binding global climate deal, which significantly impacts carbon intensive fuels, like coal.

At least a dozen U.S. coal companies went bankrupt between 2003 and 2014.

Big banks like JPMorgan Chase, Bank of America, and Morgan Stanley have all stated they will be moving away from investing in coal projects.

China – the world's biggest producer and consumer of coal – will be closing about 4,300 coal mines over the next three years.

Lummi Nation, near Bellingham, WA, recently, rejected a coal transit facility.

Indeed, Carbon emissions regulation has made carbon an economic good.

Of course a few things haven't changed:

Real royalty rates are far below what is legally mandated.

Coal mining continues to have safety and reclamation costs.

Because of these factors, people here in Utah, have chosen to support alternatives to coal:

The western US solar industry is booming, led by Utah based Vivint Solar.

People pay extra to support the Rocky Mtn. Power Blue Sky program, which seeks to minimize carbon intensive fuel externalities.

Municipalities in Utah are incentivizing customers to switch from wood and coal heat sources because of air pollution concerns.

In sum, the economics of carbon has changed significantly in the past 25 years and projections worldwide change the viability of coal. I encourage the Interior Department to conduct a thorough PEIS, accounting for the complete economic costs, including externalities, of the coal leasing program.